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FEB 26 2020

**CLERK, U.S. DISTRICT COURT
ANCHORAGE, A.K.**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

STEVEN STOUFER,)	
)	
Plaintiff,)	
)	
v.)	
)	
FEDERAL BUREAU OF)	
INVESTIGATION,)	
)	
DEPARTMENT OF JUSTICE)	
OFFICE OF INSPECTOR GENERAL,)	
)	
Defendants.)	Case No.
_____)	

Jury demand

COMPLAINT

1. Plaintiff STEVEN STOUFER files this Freedom of Information Act suit seeking the release of records relating to STEVEN STOUFER.

JURISDICTION AND VENUE

2. This court has jurisdiction over this action pursuant to 5 U.S.C 552(a)(4)(B) and 28 U.S.C. 1331.
3. Venue is proper under 28 U.S.C. 1391(e).

INTRODUCTION

4. Plaintiff's request for Defendants' records includes those records descriptive of criminal activity. Plaintiff reported several crimes to the Anchorage Police Department including crimes of assaults, threats, and harrassment. Defendants' records provide essential clarification of the circumstances, including the participation and organization, needed for redress.
5. Defendant FBI may have been involved in the crimes.
6. Plaintiff believes the crimes were arranged in retaliation for the Plaintiff's rejection of two recruitment events as follows:
7. One event involved a team of interactive surveillance personnel that attempted to recruit the Plaintiff. The Plaintiff later recognised one member of the interactive surveillance team from various news stories as being Esteban Santiago. The stories stated Santiago travelled to a Florida airport and committed a terrorist act.
8. The second event involved a person that approached the Plaintiff and wanted the Plaintiff to be involved in a group the person organized. An Alaska Dispatch News publication later identified this person as engaging in a tribal disruption of the 2015 Glacier Conference held in Anchorage, Aklaska. Plaintiff believes this person was affiliated with the FBI or some other law enforcement organization and was recruiting the Plaintiff to participate in the tribal disruption.
9. The Plaintiff believes the FBI or another law enforcement organization retailiated when these recruitment events were refused.

PARTIES

10. Plaintiff STEVEN STOUER made the FOIA request at issue in this case.

11. Defendants are federal agencies subject to the Freedom of Information Act, 5 U.S.C. 552, and/or components of the U.S. Department of Justice.

NATURE OF ACTION

12. On or about July 18, 2019, Plaintiff filed a FOIA with the DOJ Office of the Inspector General (DOJOIG) for any records related to the Plaintiff.
13. On July 31, 2019 the DOJOIG acknowledged receipt of the FOIA request and assigned it tracking number 19-OIG-332.
14. On August 26, 2019 the DOJOIG provided one summary document. The document was only a brief summary of certain information Plaintiff provided to the DOJ. The DOJOIG did not provide any records collected during its investigative or any records descriptive of a DOJIG investigative conclusion.
15. On January 16, 2020 the Office of Information Policy denied the Plaintiff's appeal for request 19-OIG-332.
16. On March 21, 2018 Plaintiff filed a FOIA request with the FBI for any records related to the Plaintiff.
17. On April 13, 2018 FBI acknowledged receipt of the FOIA request and assigned it tracking number 1400794-000 and in a separate letter also assigned the FOIA request tracking number NFP-93664. The FBI stated there were no responsive records for 1400794-000.
18. The April 13, 2018 NFP-93664 letter stated the Plaintiff's FOIA request "does not contain enough descriptive information to permit a search of our records." The FBI wanted the Plaintiff to "please provide us more specific information."

19. On July 11, 2018 Plaintiff emailed more specific information for NFP-93664 to the email address for the FOIPAquestions address. A response from the FOIPAquestions address stated that the more specific information sent to the FOIPAquestions address would be forwarded to the appropriate FOIA analyst.
20. On September 17, 2018 the Office of Information Policy denied the Plaintiff's appeal for request 1400794-000.
21. On August 6, 2019 the FBI informed Plaintiff that NFP-93664 and 1400794-000 were closed. The FBI did not provide any records.
22. Plaintiff is being irreparably harmed by reason of Defendants' unlawful withholding of records responsive to Plaintiff's FOIA request, and Plaintiff will continue to be irreparable harmed unless Defendants are compelled to follow the law.

COUNT 1 – DEFENDENTS' VIOLATION OF FOIA

24. The above paragraphs are incorporated herein
25. Defendants are agencies subject to FOIA
26. Plaintiff made a FOIA request to Defendants for agency records
27. Defendants failed to produce the requested records needed for a civil suit

COUNT 2 – DEFENDENTS' VIOLATION OF APA

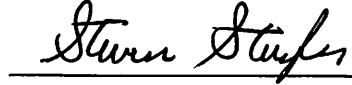
28. The above paragraphs are incorporated herein
29. Defendants are agencies subject to foia
30. Plaintiff made a FOIA request to Defendant for agency records
31. Defendants' policy and/or procedure requiring a lawsuit to access the requested records is an abuse of descretion

WHEREFORE, Plaintiff asks the Court to:

- A. Order Defendants to produce the requested records;
- B. Order Defendants to provide Plaintiff, by a certain date, a listing of what exemptions are being claimed for lawfully withheld records so that the validity of those exemptions may be reviewed by the Court;
- C. Award Plaintiffs their costs and attorney fees; and
- D. Grant the plaintiff all further relief to which Plaintiff may be entitled.

DATED: February 26, 2020

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Steven Stoufer", is written over a horizontal line.

STEVEN STOUFER